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March 20, 2017

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VIA ECF
Judge Margo K. Brodie
225 Cadman Plaza East
Brooklyn New York 11201
Telephone: (718) 613-2140

Re: Liu v. Da Di Chinese Food, Inc., et al.

Case No. 1:16-cv-00937

Request for Extension of time to file Response to Defendants' Pre-motion Conference Request

Dear Judge Brodie:

This office represents the Plaintiff in the above-referenced matter. On March 17, 2017, Defendants requested a Pre-motion Conference for their anticipated motion for Summary Judgement ("Defendant's March 17 Request"). ECF. No. 32. Per your Honor's Individual Rule, Plaintiff has an option to respond in seven (7) days. On March 20, 2017, Magistrate Judge Steven L. Tiscione granted Plaintiff's request to extend the discovery deadline to March 31, 2017 so we can depose two non-party witnesses. *See* Decision issued on March 20, 2017. Because the non-party witnesses' deposition testimony may affect the parties' prospect of filing potential dispositive motions, we respectfully request that Plaintiff's time to respond to Defendants' March 17 Request be extended to **April 17, 2017**.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ *Keli Liu*
Keli Liu, Esq.